

# **CALIFORNIA WOOL GROWERS ASSOCIATION**

Unifying the voice of the California Sheep Industry since 1860.

July 1, 2005

United States Department of Agriculture  
Animal Plant and Healthy Inspection Services  
National Animal Identification System  
4700 River Road, 118  
Riverdale, MD 20737

**Re: Docket # 05-015-1**

The California Wool Growers Association (CWGA) is pleased to have the opportunity to provide comments on Docket No. 05-015-1. CWGA is the trade association representing more than 4000 producers and 700,000 sheep within the state of California. The CWGA realizes the importance of an effective National ID program, however there are economic and practicality impacts which must be fully addressed and analyzed prior to implementation of such program. The following points are the key components, which need to be addressed when finalizing the program.

## **Scrapie Program**

The National Scrapie program, which has been implemented within the sheep industry, exemplifies the dedication producers have to supply a safe product to consumers. The program provides adequate premise traceback as well as individual records if needed or required. Additionally, this program has already cost the government and individual producers a substantial amount of time and money. Creating a new standard program which is not implemented in conjunction with the Scrapie program is not only redundant, but a waste of current tax payers dollars as well. CWGA would support a program using the Scrapie program as a solid foundation.

This would enable sheep producers throughout the United States to continue with their mandated and already implemented ear tagging requirements. To require two separate tags and numbers for each animal would prove to be unnecessary and a duplication of effort and record keeping. Fusing of these programs into one would is recommended by CWGA.

Full implementation of the scrapie program has caused numerous difficulties in normal interstate commerce of lambs and cull sheep. Although this program has been in place for more than 6 years, there are still substantial issues with noncompliance and producer understanding of the requirements within the Scrapie program. The infrastructure to support a National ID System is going to be extensive. It is strongly suggested the understanding of individual identification gained from implementation of the scrapie program needs to be used when developing the new National ID plan.

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### **Current Traceback Abilities**

Within the sheep industry and programs such as Hazard Analysis Critical Control Point (HACCP) and Quality Assurance programs there is the current ability to trace animals back to their original owner. These programs offer a trace-back opportunity that is being utilized amongst producers and packers within the industry. Currently packing facilities have the ability to track a carcass or animal back to the original. Producers can identify which premises the particular lot or individual animal has been, which satisfies the intent of the national ID effort. These programs in addition to the National Scrapie program exhibits previous work the industry has implemented in order to assure a safe and reliable food supply.

### **Premise Definition**

The way in which a premise is defined is crucial to the California sheep industry. Currently wide arrays of definitions are being offered, which makes interpretation of the rules very complex and difficult. CWGA recommends that a premise be defined and used to traceback to the original owner of the animal. Proper tracking of the animal would take place when it either enters the market chain, a change of ownership occurs, when the animal crosses state lines, or when commingling occurs with other animals.

CWGA highly discourages an individual premise being defined as each parcel of land the sheep/animal may encounter throughout their life. If this definition and requirement is enforced, producers within California will be forced out of business, as it will be an impossible task to abide by this requirement. Producers within the state of California rely on leases of alfalfa fields to graze their sheep during the winter months and other crop residues throughout the year. Producers within the state lease from many landowners, which adds complexity to the premise identification process. The landowners whom the producers lease from are not necessarily involved with animal agriculture, which means that requiring these individuals to register a premise will be an added burden, and will result in a lack of land available for lease to sheep producers. In addition, sheep may be moved daily from one pasture/premise to another. The requirement of recording this movement is rigorous and a large burden on the producer. When tracking these animals, it is strongly encouraged that a group/lot ID be utilized. These animals typically move with one another at all times. A group lot ID, similar to the plan developed for the swine industry would lessen the time and economic burden being placed on these animals and producers.

### **Movement of Animals**

Another concern in regards to the recording of the animals' movement is the practicality of collecting the information and ID of each animal as they are being transferred. There are two problems; the first being that producers do not necessarily move sheep through a chute when they are moved from one pasture to another. Often producers move the sheep by herding them from one pasture to another rather than loading them on a trailer. The second concern relates to the practicality of being able to record the animals ID when they are being transported in a trailer. By stopping sheep in a chute to record each individual animal the time involved would increase substantially, but also the sheep would be nearly impossible to load as the transition into the trailer would be a stop – and – go system. Sheep require unimpeded “follow the leader” motion in order to move through facilities and/or onto trucks in a humane and timely manner. For these reasons, it is imperative that the technology associated with the program is suitable for these types of commercial applications.

### **Technology**

The technology involved with tracking the animals is a concern of the producers. The equipment being considered has not been adequately field-tested. Many producers do not rely on computers and the practicality of collection and transmission is questionable, particularly from remote locations. Existing reader systems are not capable of recording animals when on the move and may not function in many common production practices. The enforcement of such could prove to be too complex for producers to use correctly, and could result in improper data recording. By allowing producers to try and test the technology, recommendations could be made to improve the tags and readers, which would prove to be beneficial when finalizing the programs requirements.

Producers are concerned with the retention rate of the proposed tags being used. It was discovered within the Scrapie program that the tags originally used were faulty and did not remain on the animal. If a tag cannot remain on the animal then it is pointless to attempt to track, since once the tag is lost the individual records of that particular animal are also gone. A greater concern is the availability of the recording technology.

A uniform technology foundation needs to be established. This may include extensive analysis of technology being used within other countries, which currently have an animal identification system. By analyzing what is working in other countries will allow for the United States to find the best type of technology currently being used in the field.

### **Field Performance Evaluation**

At this point in time conducting thorough field tests and pilot projects is strongly encouraged. The CWGA commends the USDA in recognizing the importance of a field-test. However, increased funding must be made available, and must be included within the budget of the program. CWGA encourages the NAIS to have a minimum two years of field trials. These trials could depict the problems that may occur with the program; it would be encouraged to use a variety of producers within the trial, and specifically those involved with commercial production, and would be faced with pasture-to-pasture and group/lot movement.

### **Cost Benefit Analysis**

It appears the cost associated with RFID tags and readers is very significant for producers, especially if lambs will be required to be tagged. In some years the cost would exceed the profit margin. If the plan passes and is required a cost share program must be developed in order to absorb the additional costs, otherwise this program will be detrimental to the California and American sheep industry.

It would also prove to be beneficial to conduct a cost benefit analysis on the additional costs and assumed benefits coordinated with the program. If the analysis proves to be advantageous to the producer and consumer then the association would be more likely to support and abide by the regulations set forth. It is the opinion of the CWGA that the primary beneficiary of the proposed program is the public sector as the proponents all speak to the fact that this program will help to ensure food safety. If the primary beneficiary is the public, then the public should be expected to shoulder the financial burden – just as we do for public security – and just as countries in the EU for their livestock ID programs.

**Additional Points**

The sheep industry within the United States, particularly within California, is very complex and diverse. This complexity makes the industry very unique, which then requires a unique system to monitor the animals, which are entering the food chain. Each level of production must be considered when developing this system. It is imperative that the USDA listens to all the facts and misgivings when developing the plan for the sheep industry.

When developing a standard program for all species, each sector must be analyzed on an individual basis. Within the animal agriculture industry each species has different requirements and production differences. Because of these differences a “blanket” program will lead to an unfair disadvantage to those sectors with larger profit margins. For example, the cost of a tag will have a different impact whether you are raising sheep or cattle. To cattlemen the cost margin of producing cattle is far greater than marketing sheep. By enforcing the same cost and requirements on each species sector, the cattlemen will be given a comparative advantage. It is the hope of CWGA that these practical concerns are addressed when developing the final program.

To recap: The purpose of a national ID program is to be able to track animals in the event of some disease or food safety issue. The industry currently has a program, which allows adequate tracking of animals for the diseases that are currently perceived as being problematic. Producers desire to track their livestock for production record purposes may do so via the several well established programs on the market. The more extensive and convoluted the program – the less likely it is to work. There has not been a demonstrated threat to human health and safety originating from the sheep industry in the USA. Establishing a program that appears to be best designed for other species with entirely different sets of circumstances seems to be a one-size fits all mentality that has failed on numerous occasions in the past.

The United States Animal Identification Plan (USAIP) has established a solid base of recommendations from the sheep industry. I hope that the information and work gathered by this committee will be used when establishing the final guidelines as producers were involved with the initial stages and discussions.

The California Wool Growers Association and its membership base would be more than willing to work with USDA in order to assure the program is practical and economically feasible for those involved with the production chain. When establishing the final stages of the system and you find that you have production related questions, please do not hesitate to contact the CWGA and any of its members.

Respectively,

Lesia Eidman  
Executive Director